

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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:  
UNITED STATES OF AMERICA, : S 12 10 Cr. 905 (LTS)  
:  
- against - : NOTICE OF PRETRIAL  
: MOTIONS PURSUANT TO  
: RULE 12(b), FED.R.CRIM.P. \_\_\_\_\_  
DANIEL VALDEZ, : (Electronically Filed)  
:  
Defendant.  
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PLEASE TAKE NOTICE, that upon the annexed Declaration of Joshua L. Dratel, Esq., the accompanying Memorandum of Law, and all prior papers and proceedings herein, the defendant, DANIEL VALDEZ, will move before the Honorable Laura Taylor Swain, United States District Judge for the Southern District of New York, at the United States Courthouse located at 500 Pearl Street, New York, New York, as soon as counsel may be heard, for an order:

- (a) pursuant to Rule 14, Fed.R.Crim.P., granting a severance of Mr. Valdez's trial from his co-defendants' trial;
- (b) granting Mr. Valdez leave to join in his co-defendant Manuel Geovanny Rodriguez-Perez's motion to suppress wiretap evidence;
- (c) granting Mr. Valdez leave to join in the other motions filed by his co-defendants to the extent they inure to his benefit; and
- (d) for any such other and further relief as to the Court seems just and proper.

Dated: January 11, 2012  
New York, New York

Respectfully submitted,

/s/Joshua L. Dratel  
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To: THE HON. LAURA TAYLOR SWAIN  
UNITED STATES DISTRICT JUDGE

UNITED STATES ATTORNEY  
SOUTHERN DISTRICT OF NEW YORK